

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

V.

DAVID BUTZIGER

:  
:  
:  
:  
:

Case No.: 1:20-MJ-33-LDA

**DEFENDANT'S MOTION TO MODIFY CONDITIONS**

Now comes Defendant, David Butziger, by and through counsel, and hereby moves this Honorable Court to modify the conditions of his release to allow him to travel to the District of Massachusetts for the purpose of employment. As grounds for this request, Mr. Butziger avers the following:

1. Mr. Butziger is charged with Conspiracy to Make False Statement to Influence the SBA, in violation of 18 U.S.C. § 371; Conspiracy to Commit Bank Fraud, in violation of 18 U.S.C. § 1349; and Bank Fraud, in violation of 18 U.S.C. § 1344 (2).
2. He initially appeared, telephonically, before the Court on May 5, 2020 and was released on \$10,000.00 unsecured bond with conditions that include restricting his travel to the District of Rhode Island.
3. Mr. Butziger seeks to modify this condition to allow him to travel into Massachusetts.
4. Mr. Butziger is the owner and operator of Dock Wireless, located at 44 Bowen Briggs Avenue, Warwick, RI 02886. This company specializes in telecommunication services and full-service wireless internet networks for boats and marinas.
5. This business also provides drug and alcohol testing for marine professionals.
6. Mr. Butziger seeks permission from to Court to travel to Massachusetts where some of his equipment suppliers are located. For example, he has a business relationship with Micro Center, located at 730 Memorial Drive, Cambridge, MA 02139 from which he obtains commercial grade equipment for his business that is unavailable locally. Mr.

Butziger also has a customer base in Massachusetts to whom he sells equipment and provides services.

7. Mr. Butziger is in full compliance with all the terms and conditions of his release.
8. The government has no objection to this modification request.
9. Based upon the foregoing, Mr. Butziger asks to this motion be granted to modify his conditions of release to allow travel into Massachusetts for employment purposes.

Respectfully submitted this 14<sup>th</sup> day of May 2020.

Respectfully submitted  
DAVID BUTZIGER  
By his Counsel,

/s/ John L. Calcagni III, Esq.  
John L. Calcagni III (# 6809)  
One Custom House Street, Suite 300  
Providence, RI 02903  
Phone: (401) 351.5100  
Fax: (401) 351.5101  
Email: [jc@calcagnilaw.com](mailto:jc@calcagnilaw.com)

### **CERTIFICATION**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on May 14, 2020.

/s/ John L. Calcagni III, Esq.  
John L. Calcagni III (# 6809)  
Law Office of John L. Calcagni III, Inc.  
One Custom House Street, Suite 300  
Providence, RI 02903  
Phone: (401) 351.5100  
Fax: (401) 351.5101  
Email: [jc@calcagnilaw.com](mailto:jc@calcagnilaw.com)